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District of Nevada

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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VENONA RICHION,

Plaintiff,

v.

NANCY A. BERRYHILL¹,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:16-CV-02243-GMN-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant"), respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm, due on February 22, 2017, by 30 days, through and including March 24, 2017.

¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Acting Commissioner Carolyn W. Colvin as the defendant in this suit. No further action needs to be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 An extension of time is needed because Defendant's counsel has been out of the office
2 unexpectedly to care for a family member with a medical issue. This request is made in good faith with
3 no intention to unduly delay the proceedings.

4 Counsel for Defendant conferred with Plaintiff's counsel February 20, 2017, who has no
5 opposition to this motion.

6 Respectfully submitted this 20th day of February 2017.

7 DANIEL G. BOGDEN
8 United States Attorney

9 /s/ Jennifer A. Kenney
10 JENNIFER A. KENNEY
Special Assistant United States Attorney

11 OF COUNSEL:

12 DEBORAH LEE STACHEL
13 Regional Chief Counsel, Region IX
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15 IT IS SO ORDERED:

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18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 2-21-2017
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CERTIFICATE OF SERVICE

I, **JENNIFER A. KENNEY**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

CYRUS SAFA
Law Offices of Lawrence D. Rohlfing
12631 East Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

GERALD M. WELT
732 Sixth Street, Suite 200-D
Las Vegas, NV 89101

Dated this 20th day of February 2017.

/s/ Jennifer A. Kenney
JENNIFER A. KENNEY
Special Assistant United States Attorney